

1 2 3 4 5	Michael B. Bernacchi (Specially appearing) California Bar No. 163657 Nancy Jerian Marr (Specially appearing) California Bar No. 143248 BURKE, WILLIAMS & SORENSEN, LLP 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: 213.236.0600 Fax: 213.236.2700 E-mail: mbernacchi@bwslaw.com, nmarr@bwslaw.com		
6 7	Attorneys for Defendant Hartford Life and Accident Insurance Company		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	SONDRA WILLIAMSON,	Case No. 2:23-cv-00485-APG-NJK	
12	Plaintiff,	ORDER EXTENDING TIME FOR DEFENDANT	
13	v.	HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY TO ANSWER	
14	HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY, as Claims	OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT	
15	Administrator for the Bank of America Long-Term Disability Plan,	[First Request]	
16	Defendant.	[First Request]	
17	Defendant.		
18			
19	Plaintiff Sondra Williamson ("Plaintiff"), through her counsel, Julie A. Mersch of the Law		
20	Office of Julie A. Mersch, and Defendant Hartford Life and Accident Insurance Company		
21	("Hartford"), through its counsel, Michael B. Bernacchi and Nancy J. Marr of the law firm of		
22	Burke, Williams & Sorensen, LLP, hereby respectfully submit this Stipulation, Request and		
23	Order to Extend Time to Answer or Otherwise Respond to Plaintiff's Complaint (the		
24	"Stipulation"). This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR II 7-1 of the		
25	Local Rules of this Court. This is the first request for an extension of time for Hartford to file an		
26	answer or otherwise respond to Plaintiff's Complaint.		
27	Hartford was served with Plaintiff's Complaint on April 10, 2023, making its current		
28	responsive pleading due on or before May 1, 2023. The instant extension is requested as		

1	Hartford's counsel requires additional time for the following reasons: Hartford's counsel only		
2	became aware on April 28, 2023 that the company was served with the complaint on April 10,		
3	2023. They thus need additional time to obtain local counsel, apply for admission <i>pro hac vice</i> ,		
4	and review the file in order to prepare a responsive pleading to Plaintiff's Complaint, which may		
5	take some time given the complexity of the file.		
6	Upon agreement by and between all the parties hereto as set forth herein, the undersigned		
7	respectfully requests this Court grant an extension of time, up to and including May 22, 2023, for		
8	Hartford to file an answer or otherwise respond to Plaintiff's Complaint. By entering into this		
9	Stipulation, none of the parties waive any rights they have under statute, law or rule with respect		
10	to Plaintiff's Complaint.		
11	DATED this 1st day of May, 2023.		
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13	Enviorated of Jeele 11: Menderi Benne, Wielen in Sec. 5	ORENSEN, LLP	
14	Julie A. Mersch Michael B. Bernacchi Nancy Jerian Marr		
15	By: /s/ Julie A. Mersch By: /s/ Michael B. Bernacc	hi	
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19		t insurance company	
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21	ORDER ORDER		
22	22 IT IS SO ORDERED.		
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24	UNITED STATES MA	GISTRATE JUDGE	
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